

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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SAMAD BROTHERS, INC., :

Plaintiff, :

-- against -- :

BOKARA RUG CO. INC., JAN SOLEIMANI, and
GABRIEL VAKNIN, :

Defendants. :

Case No. 09 Civ. 5843
(JFK / KNF)

NOTICE OF MOTION

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PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. Pro. Rule 45 and, plaintiff Samad Brothers, Inc., by their attorneys, will move this Court, before the Honorable John F. Keenan, upon the annexed declaration of Mark S. Kaufman, and the exhibits annexed thereto, and the accompanying Memorandum of Law, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for an order pursuant to Fed. R. Civ. Pro. Rule 45 to quash the subpoena dated October 27, 2010, issued to Vikram Kapoor.

Pursuant to Local Rule 6.1(b), any opposing affidavits and answering memoranda shall be served within fourteen days after service of the moving papers, and any reply affidavits and memoranda of law shall be served within seven days after service of the answering papers.

Dated: New York, New York
November 11, 2010

KAUFMAN & KAHN, LLP



Mark S. Kaufman

(Email: kaufman@kaufmankahn.com)

747 Third Avenue, 32nd Floor

New York, NY 10017

(212) 293-5556

Attorneys for Plaintiff